

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FILED

Sep 5. 2008  
SEP 5 2008

MB

Jerome Allen James )  
Plaintiff )  
vs. )  
Michael Sheahan, Scott Kurtovich, )  
Director Andrews, Supt. Doe, Chief Doe, )  
Captain Doe, Lt. Mundt, Sgt. Doody, )  
M. Rentas, Sgt. Wayne, C/O McClendon, )  
Ollie Gavin, Tyrone Gilmore, )  
Brian Ruzanski, Joe Doe 1-30 )  
Defendant )

08cv1019 MICHAEL W. DOBBINS  
Case No. 08 C 1019 CLERK, U.S. DISTRICT COURT

Honorable Judge James Holderman  
Magistrate Judge Schenkier

MOTION FOR DISCOVERY

Now comes the plaintiff, Jerome Allen James, in his own proper person, pursuant to S.Ct. Rule 26 3(A), and request that this Honorable Court Order Cook County Jail official, and it's records office to disclose the following documents to the Plaintiff (pro se).

1) All reports made by defendants, Doody, Mundt, Gavin, Gilmore, Ruzanski, and others in regards to the April 26, 2006. The reports should include but are not limited to;

- A. Use of force Reports
- B. Incident Reports
- C. Disciplinary Reports

2) All photographs taken by Cook County Sheriff Police in relation to the incident involving plaintiff on April 26, 2006.

3) All Cook County Jail Rules and Regulations for Detainees, and C.C.J General Orders which shall include but is not limited to;

- A. Use of force Module
- B. Administrative Segregation
- C. Disciplinary Segregation
- D. Grievance Procedures
- E. Disciplinary Procedure
- F. Investigative Procedure

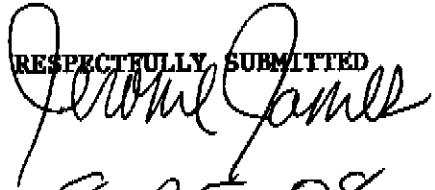
4) All grievances and other complaints filed by Plaintiff involving the excessive use of force used against him on April 26, 2006

In support of this Motion the Plaintiff states the following;

- (1) Plaintiff Detainee's copies of all or most of the documents in his possession before his property was destroyed by a Cook County Jail employee.
- (2) After making repeated attempts to receive copies of these documents by way of the

C.R.W. of Cook County Jail, and other administrative means, Cook County Jail Officials informed this Plaintiff that the documents would have to be recovered through a Court Order by the Court for the purpose of this 42 U.S.C. 1983 Complaint. Wherefore, This Plaintiff respectfully request that this Honorable Court Order Cook County Jail Officials to disclose the above requested documents to this Plaintiff for the purpose of this 1983 Claim.

RESPECTFULLY SUBMITTED

  
DATE: 8-25-08